

# Exhibit 1

**From:** Jeffrey R. Maguire  
**To:** "Srivastava, Nidhi"; Konkel, Mark; Hamar, Diana R.; "Steiner, Robert"  
**Cc:** "Patrick Keegan"  
**Subject:** Sealock v. Covance, Inc.  
**Date:** Monday, February 11, 2019 1:22:40 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Mark/Diana:

Do you have time for a call this week to discuss discovery of the opt-ins? I wanted to first discuss timing for the responses. I do not have contact yet with many of these opt-ins so we need to discuss a realistic timeline. Relatedly, I want to discuss representational discovery. It is my position that written discovery on each opt-in is unduly burdensome, especially considering that the information sought is substantially already in Covance's possession. Scott v. Chipotle Mexican Grill, Inc., 300 F.R.D. 188, 193 (S.D.N.Y. 2014)

Please let me know when you are available for a call.

Best Regards,

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